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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,
14 Plaintiff,

15 vs.

16 KALEB LOUIS
17 Defendant.

18 CASE NO.: 2:17-cr-00180

19 FIRST STIPULATION TO CONTINUE TIME
20 FOR SENTENCING

21 **STIPULATION TO CONTINUE TIME FOR SENTENCING**

22 IT IS HEREBY STIPULATED AND AGREED by and between Richard Anthony Lopez,
23 Assistant United States Attorney, counsel for the United States of America, Maysoun Fletcher,
24 Esq., counsel for defendant KALEB LOUIS, that the Sentencing Hearing currently set for July 16,
25 2018 at 11:00 a.m. be vacated and reset thirty (30) days.

26 This Stipulation is entered into for the following reasons:

- 27 1. This is the first request for a continuance.
28
2. The defendant does not object to the continuance.
29
3. The Plea Agreement between the United States and Kaleb Louis allows for a 2 point
30 reduction in the total offense level if at least 8 defendants change their plea to guilty
31 and are pending sentencing, a 3 point reduction if at least 11 defendants change their
32 plea to guilty, and a 4 point reduction if at least 14 defendants change their plea to
33 guilty.

- 1 4. At the time of preparing this Stipulation, at least 6 defendants have changed their
2 plea to guilty and it is anticipated that another 2 or more will change their plea to
3 guilty in the upcoming 30 days.
4 5. To secure the benefit of the minimum 2 point reduction contemplated in the Plea
5 Agreement, the parties are seeking to continue sentencing 30 days.
6 6. Denial of this request for continuance could result in a miscarriage justice.
7 7. For the above-stated reasons, the ends of justice would best be served by a
8 continuance of the current sentencing hearing (30) days.

10 DATED: July 2, 2018.

11
12 /s/ Richard Anthony Lopez
13 RICHARD ANTHONY LOPEZ, ESQ.
13 Assistant United States Attorney

14
15 /s/ Maysoun Fletcher
16 MAYSOUN FLETCHER, ESQ.
17 Attorney for Defendant, Kaleb Louis

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UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,
14 Plaintiff,

CASE NO.: 2:17-cr-00180

15 vs.

16 KALEB LOUIS,
17 Defendant.

18

FINDINGS OF FACT

19 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court
20 finds:

21 This Stipulation is entered into for the following reasons:

- 22
- 23 1. This is the first request for a continuance.
 - 24 2. The defendant does not object to the continuance.
 - 25 3. The Plea Agreement between the United States and Kaleb Louis allows for a 2 point
26 reduction in the total offense level if at least 8 defendants change their plea to guilty and are
27 pending sentencing, a 3 point reduction if at least 11 defendants change their plea to guilty,
28 and a 4 point reduction if at least 14 defendants change their plea to guilty.
 - 29 4. At the time of preparing this Stipulation, at least 6 defendants have changed their plea to
30 guilty and it is anticipated that another 2 or more will change their plea to guilty in the
31 upcoming 30 days.

5. To secure the benefit of the minimum 2 point reduction contemplated in the Plea Agreement, the parties are seeking to continue sentencing 30 days.
6. Denial of this request for continuance could result in a miscarriage justice.
7. For the above-stated reasons, the ends of justice would best be served by a continuance of the current sentencing hearing (30) days.

CONCLUSIONS OF LAW

Denial of this request for continuance would deny the Defendant herein the opportunity to benefit from a contemplated reduction in total offense level.

Additionally, denial of this request for continuance could result in a miscarriage of justice.

ORDER

IT IS HEREBY ORDERED that the Sentencing Hearing currently scheduled for July 16, 2018 at 11:00 a.m. is hereby vacated and reset to August 27, 2018, at the hour of 9:00 a.m.

IT IS SO ORDERED.

DATED this 6th day of July, 2018.



U.S. DISTRICT JUDGE